



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, N.Y. 10007

PAUL H. JOHNSON
phone: (212) 356-2656
fax: (212) 356-3509
pajohnso@law.nyc.gov

February 28, 2017

VIA ECF

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court
for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Martinez v. City of New York, et al.
16-CV-0079 (AMD) (CLP)

Your Honor:

I am the Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department, assigned to represent defendants in the above-referenced matter. The parties jointly write to respectfully request an extension of time within which to complete depositions from Wednesday February 28, 2017 to and including Friday March 31, 2017. The parties do not wish to adjourn the status conference scheduled for March 2, 2017 at 11:30 a.m.

The parties have exchanged extensive document discovery and conducted an inspection of the precinct where plaintiff was transported to after her arrest. The parties have tentatively scheduled the deposition of the individual defendants and the non-party officers for March.

For the foregoing reasons, the City respectfully requests that the Court grant an extension of time within which to complete depositions from Wednesday February 28, 2017 to and including Friday March 31, 2017.

Thank you for your consideration herein.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "PHJ".
Paul H. Johnson
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Baree N. Fett, Esq. (via ECF)
Attorney for Plaintiff